

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Ryan S. Goldstein (Bar No. 208444)

3 ryangoldstein@quinnemanuel.com

4 Bruce E. Van Dalsem (Bar No. 124128)

5 brucevandalsem@quinnemanuel.com

6 Daniel C. Posner (Bar No. 232009)

7 danposner@quinnemanuel.com

8 865 South Figueroa Street, 10th Floor

9 Los Angeles, California 90017-2543

10 Telephone: (213) 443-3000

11 Facsimile: (213) 443-3100

12 Attorneys for TSUBURAYA

13 PRODUCTIONS CO. LTD.

14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA

16 WESTERN DIVISION

17 UM CORPORATION, a Japanese
18 corporation,

19 Plaintiff,

20 vs.

21 TSUBURAYA PRODUCTIONS CO.
22 LTD., a Japanese corporation,

23 Defendant.

CASE NO. 2:15-cv-03764-AB-AJW

**DECLARATION OF CHRIS
REYNOLDS IN SUPPORT OF
DEFENDANT AND
COUNTERCLAIMANT
TSUBURAYA PRODUCTIONS CO.
LTD.'S RESPONSE TO JANUARY
19, 2016 ORDER TO SHOW CAUSE**

Trial Date: April 18, 2017

1 TSUBURAYA PRODUCTIONS CO.
2 LTD., a Japanese corporation,

3
4 Counterclaimant,

5 vs.

6 UM CORPORATION, a Japanese
7 corporation; ULTRAMAN USA, INC.,
8 a California corporation; SOMPOTE
9 SAENGDUENCHAI, a Thai individual;
10 GOLDEN MEDIA GROUP, INC., a
11 California corporation; TIGA
12 ENTERTAINMENT COMPANY,
13 LTD., a Hong Kong corporation; and
14 DOES 1-10,

15 Counterdefendants.
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DECLARATION OF CHRIS REYNOLDS

I, Chris Reynolds, declare as follows:

1. I am a resident of Santa Rosa, California and make this declaration of my personal and firsthand knowledge. If called and sworn as a witness, I could and would testify competently hereto.

2. I have been a licensed private investigator in the State of California since 1979. I currently own and manage Chris Reynolds Investigations and have operated that business since November of 1980. I am the current President of the California Association of Licensed Investigators, the largest statewide association of its kind in the United States. I am serving my fourth term as President. I am an instructor and presenter to investigators and private employers on how to start and manage a private investigation business.

3. During the past 36 years I have located thousands of witnesses throughout the world. Most recently, I was tasked with locating a number of citizens in Nepal. I was able to locate and interview a significant number of witnesses in that country, even though there are no addresses and is no phone service in much of the country.

4. Since November 24, 2015, on behalf of Quinn Emanuel Urquhart & Sullivan, LLP, I have been making attempts to locate and serve process on Mr. Sompote Saengduenchai, aka Sompote Sands, a citizen of Thailand. Mr. Saengduenchai has listed an address of 99/9 Moo 8, Phaolyothin Rd. Km. 52, Chiangknoi, Bangpa-In, Phra Nakhon Si Ayutthaya province, 13160 Thailand. This location is approximately 54 kilometers outside of Bangkok, Thailand. My understanding is that prior visits to this location by other process servers did not result in any positive contact with Mr. Saengduenchai.

5. To ascertain whether there is a different location at which Mr. Saengduenchai may be found for service, I conducted extensive online database

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1 searches throughout Thailand, Japan and the United States. Web pages in Thai or
2 Japanese were translated through Google translations in order to search for leads.

3 6. I also made contact with a journalist who interviewed Mr.
4 Saengduenchai in the past few years. The journalist responded to my inquiry and
5 stated that the interview was arranged through a Los Angeles publicist. I was able
6 to reach the publicist, Philip Mercader, and he reported that Mr. Saengduenchai is
7 currently living in Thailand. Mr. Mercader also provided me with what he said is an
8 e-mail address for Mr. Saengduenchai: ultraman.museum@gmail.com. I attempted
9 to contact Mr. Saengduenchai by sending an e-mail to him at that address, but he has
10 not responded. The message to Mr. Saengduenchai was sent in English and Thai.

11 7. There are several bloggers online who claim to have met with or
12 interviewed Mr. Saengduenchai. I sent e-mail correspondence to the bloggers but
13 have not received any responses.

14 8. On December 9, 2015, I retained the services of an international
15 investigation agency to assist in locating Mr. Saengduenchai. The agency
16 confirmed that the address listed above is not the current residence for Mr.
17 Saengduenchai.

18 9. Since December 9, 2015, I have been working with the international
19 investigation agency to locate a more current address for Mr. Saengduenchai. The
20 governmental and Internet systems used to locate witnesses in Thailand are less
21 sophisticated and more unreliable than the systems used in the United States. In
22 addition, the difficulty of finding investigators in remote areas of Thailand makes it
23 more challenging to effectuate service of process on Mr. Saengduenchai.

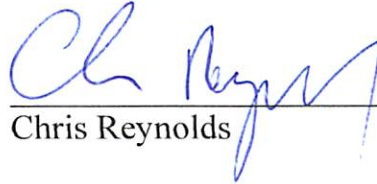
24 10. In late January 2016, I was able to locate a blogger who posted "geo-
25 tagged" photographs of a museum that is believed to be managed or used by Mr.
26 Saengduenchai. Through the geo-tags on the photographs, I was able to identify the
27 exact location of The Ultraman Museum, which is also suspected to be the residence
28 of Mr. Saengduenchai. The Museum is located in Nakhon Sawan, a city of

1 approximately 230,000 residents. I am tasking investigators to see if they can locate
2 Mr. Saengduenchai at this location. The GPS coordinates for the Museum are
3 14°10'13.5"N 100°37'04.3"E. Entering these coordinates into Google Maps will
4 identify the location of the Museum and Mr. Saengduenchai's suspected home.

5 11. I anticipate being able to coordinate an attempt to serve Mr.
6 Saengduenchai at this location shortly, and I intend to continue to diligently pursue
7 these efforts until Mr. Saengduenchai is served.

8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct.

10 Executed on this 1st day of February, 2016, at Santa Rosa, California.

11
12 
13 Chris Reynolds

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